



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

OFFICE OF
AIR AND RADIATION

MEMORANDUM

SUBJECT: Fourth Updated Recusal Statement

FROM: Joseph Goffman
Principal Deputy Assistant Administrator

TO: Michael S. Regan
Administrator

DATE: July 25, 2023

I have consulted with the Office of General Counsel/Ethics (OGC/Ethics) and been advised about my ethics obligations. This memorandum formally notifies you of my continuing obligation to recuse myself from participating personally and substantially in certain matters in which I have a financial interest, or a personal or business relationship. I also understand that I have obligations pursuant to Executive Order 13989 and President Biden's Ethics Pledge that I signed. This updated recusal statement reflects my current financial interests, and supersedes and replaces my prior June 22, 2023 recusal statement.

FINANCIAL CONFLICTS OF INTEREST

As required by 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me: any spouse or minor child of mine; any general partner of a partnership in which I am a limited or general partner; any organization in which I serve as officer, director, trustee, general partner or employee; and any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

Particular Matters Involving Specific Parties

Because of the current level of financial ownership, I am disqualified from participating personally and substantially in any particular matter that affects any of following entities as a specific party:

RECUSAL LIST – SPECIFIC PARTY MATTERS			
Abbot Laboratories	AbbVie	Accenture PLC	Agilent Technologies
Alphabet Inc.	Altria Group, Inc.	Amazon.com, Inc.	American Express Co.
Ameriprise Financial, Inc.	Aon PLC	Apple Inc.	Arthur J. Gallagher & Co.
AT&T Inc.	Brookfield Asset Management	Centene Corp.	Charter Communications, Inc.
Cisco Systems, Inc.	Colgate Palmolive Co.	Comcast Corp.	Costco Wholesale Corp.
Danaher Corp.	Deere & Company	Discover Financial Services	Disney (The Walt Disney Company)
Dollar Tree, Inc.	GSK PLC (GlaxoSmithKline)	International Business Machines Corp. (IBM)	IQVIA Holdings Inc.
Johnson & Johnson	JP Morgan Chase & Co.	Kraft Heinz Co.	Laboratory Corp. of America Holdings
Markel Corp.	Medtronic PLC	Merck & Co., Inc.	Mettler-Toledo International, Inc.
Microsoft Corp.	Mondelez International, Inc.	Monster Beverage Corp.	Nestle S.A.
Nike, Inc.	Novartis AG	Omnicom Group, Inc.	PepsiCo, Inc.
Pfizer Inc.	Philip Morris International, Inc.	Proctor & Gamble Co.	PNC Financial Services Group, Inc.
SalesForce, Inc.	Sherwin Williams Co.	State Street Corp.	S&P Global Inc.
Tractor Supply Co.	Truist Financial Corp.	Uber Technologies, Inc.	UnitedHealth Group, Inc.
U.S. Bancorp	Verizon Communications, Inc.	Visa, Inc.	Wells Fargo & Co.
Zoetis, Inc.			

Particular Matters of General Applicability

I am also disqualified from participating personally and substantially in any particular matter of general applicability that is focused on the interests of any individual discrete and identifiable class of “persons” (identified as “sectors” below). This prohibition extends to each class (or sector) individually. If a matter affects all sectors or if a particular matter affects a combination of sectors, including the ones listed below, then I understand that I do not have a financial conflict of interest.

RECUSAL LIST – INDIVIDUAL SECTORS		
Agricultural & Farm Machinery	Apparel, Accessories, & Footwear	Banks
Commodity Chemicals (Paint)	Construction Machinery & Heavy Trucks	Consumer or Courier Services
Cruise Lines	Diversified Financials (Capital Markets; Consumer Finance or Services)	Food Products
Food & Staples Retailing	Healthcare Equipment & Services	Household & Personal Products
Household Appliances (lawn & garden tools)	Insurance	Internet & Direct Marketing Retail
Logistics	Media & Entertainment (including interactive media and services, and advertising)	Multiline or Specialty Retail
Non-Alcoholic Beverages	Pharmaceuticals, Biotechnology, & Life Sciences	Professional Services
Semiconductors	Software & Services	Technology Hardware & Equipment
Telecommunication Services	Tobacco	

Corporate Bonds

I am recused from participating in any particular matter that will have a direct and predictable financial effect upon the ability and willingness of the following bond issuer to honor their obligations or that will affect their bond ratings:

RECUSAL LIST – BONDS
Comcast Corporation

DIRECTIVE AND CONCLUSION

To avoid my participating in any of the matters from which I am recused, please refer those matters to the attention of the **Chief of Staff**, without my knowledge or involvement. Therefore, do not send or copy me on substantive emails, ask me to attend meetings, participate in any discussions, make recommendations, or otherwise make decisions with regard to a particular matter covered by my recusal. Official actions on such matters should be made

without my recommendation, knowledge, or involvement. Any inquiries regarding the extent of my recusals should be directed to the Chief of Staff or OGC/Ethics.

In the event that my circumstances change, including changes to my financial interests, my personal or business relationships, or my EPA duties, then I will consult with OGC/Ethics and update my recusal statement accordingly.

cc: Janet McCabe, Deputy Administrator
Dan Utech, Chief of Staff
Elizabeth Shaw, Deputy Assistant Administrator
Tomás Elias Carbonell, Deputy Assistant Administrator for Stationary Sources
Alejandra Nunez, Deputy Assistant Administrator for Mobile Sources
Cynthia Giles, Senior Advisor
Daniel Hooper, Acting Chief of Staff
Justina Fugh, Director, Ethics Office